

RE: narrowing down the spray record request

Elizabeth Allen to: Sheila Fleming, Scott Downey, Linda Liu, Kay Morrison

11/01/2011 01:42 PM

There is certainly an interesting dynamic going on here. I'm not surprised that they want such long-term data, and it's certainly more critical should any kind of medical monitoring occur here, or if they decide that looking at some sort of area-specific morbidity statistics is a worthwhile effort. And as each year passes, I'm confident that the data that fall outside the statutory 3-yr range is forever lost to them. So, if the two requests are similar as to area, where did Dale's 822 sq miles come from?

But in terms of our immediate investigation, the spring spray data is of particular interest. Certain aspects of the recent sampling are somewhat unexpected, in particular the apparent absence of atrazine and 2,4-D in drinking water sources. Bear in mind that in discussing the initial Dana Barr results with nearly every other risk assessor here, the immediate assumption was that exposure via drinking water was the most obvious source. So now, our conceptual model appears to have a flaw. Either both steady-state and immediate post-spray exposures via inhalation are greater than we anticipate, or the spring urine sampling results are beginning to look a bit "curious." In particular, the large increase in the reported "post-spray" results raise a lot of questions, particularly if either atrazine or 2,4-D, or both, weren't applied. In fact, the lack of that data at this point in the investigation is actively making it more difficult to determine how to best apply our limited resources going forward.

Elizabeth

"Douglas Jae P"

Hi Sheila, Thanks for this. I don't think the area y...

11/01/2011 11:24:18 AM

From: "Douglas Jae P" <jae.p.douglas@state.or.us>
To: Sheila Fleming/R10/USEPA/US@EPA, "Jae P DOUGLAS" <jae.p.douglas@state.or.us>, "Sujata JOSHI" <sujata.joshi@state.or.us>
Cc: Scott Downey/R10/USEPA/US@EPA, Richard Kauffman/R10/USEPA/US@EPA, Elizabeth Allen/R10/USEPA/US@EPA
Date: 11/01/2011 11:24 AM
Subject: RE: narrowing down the spray record request

Hi Sheila,

Thanks for this. I don't think the area you have identified is much different than the townships we included in the request (approx. 282 sq. mi) but the date ranges are much more limited. We are holding, for now, to the request for all three years required by statute to provide a broader picture of the year to year fluctuations (if they exist) in what is applied, and to ensure that what is applied during the EI period isn't substantially different than what has historically been applied.

Gail and I met with ODA at the end of last week to see if we can come up with some ideas for how to fulfill the request without creating unnecessary burden. We had a productive conversation but still have some issues to untangle. More to come I'm sure.

Jae

-----Original Message-----

From: Fleming.Sheila@epamail.epa.gov [mailto:Fleming.Sheila@epamail.epa.gov]
Sent: Tuesday, November 01, 2011 9:48 AM
To: Jae P DOUGLAS; Sujata JOSHI
Cc: Downey.Scott@epamail.epa.gov; Kauffman.Richard@epamail.epa.gov; Allen.Elizabeth@epamail.epa.gov
Subject: narrowing down the spray record request

Hi Jae and Sujata,

As we mentioned on our call last week, perhaps it would be easier for ODF and ODA if we narrowed down the area and dates for the initial application record request. I don't know what area was encompassed in the 866 sq mi Dale referred to on our last call, but the spray records for the area within the coordinates listed below would be a good start.

NE	-123.469	44.22
NW	-123.739	44.22
SE	-123.469	44.076
SW	-123.739	44.076

Total Area: 262 sq miles

The date ranges we are most interested in are March 20 through April 19, 2011 (corresponding to the month preceding the collection of the urine samples submitted to Dana Barr) and approximately August 3 through September 2, 2011 for the month before the OHA/ATSDR biomonitoring event.

Of course, it would be nice if ODA and ODF provided all of the spray records you requested, but perhaps we can help them prioritize the application requests. Please let me know if you have any questions.
Thanks, Sheila

Sheila Fleming, P.E., Manager
Risk Evaluation Unit
Office of Environmental Assessment
US EPA Region 10, 1200 Sixth Avenue, Suite 900, Seattle, WA 98101 Office
206-553-1417 Cell (b) (6) fleming.sheila@epa.gov